

**Federal Defenders
OF NEW YORK, INC.**

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February 16, 2023

BY ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
New York, New York 10007

**Re: United States v. Juan LaSanta
22 Cr. 583 (PAC)**

Dear Judge Crotty:

I am the attorney for Juan LaSanta, the defendant in the above-captioned case, and write to request that in lieu of today's proceeding that the parties propose the following motion schedule and adjourn today's conference. After conferring with the prosecution, the parties propose the following schedule: defense's motions to be due on April 13, 2023; prosecution's response to be due on May 15, 2023; and defense's reply to be due on May 22, 2023. I have conferred with AUSA Adam Sowlati and I understand that he does not object to this proposed schedule. The parties respectfully request that the Court exclude time between today and June 1, 2023. The parties submit that the interests of justice served by an exclusion outweigh the defendant's interest in a speedy trial because an exclusion will allow the parties to prepare for and complete motion briefing and engage in negotiations regarding a potential pretrial resolution. Thank you for your consideration of this request.

Respectfully Submitted,

/s/ Marisa K. Cabrera
Marisa K. Cabrera, Esq.
Assistant Federal Defender
Tel.: (917) 890-7612

cc: AUSA Adam Sowlati (by ECF)

2/21/2023

The proposed schedule is adopted. A conference will be held on June 1, 2023 at 2:45PM. Time will be excluded through June 1, 2023. SO ORDERED.

